



Ventura County
Air Pollution
Control District

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Michael Villegas
Air Pollution Control Officer

August 7, 2019

Richard Corey
Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Withdrawal Request for 1994 Ventura County 1-hour Ozone Plan Contingency Measures and 1997 Ozone Plan

Dear Mr. Corey,

Following the recent discussion with the U.S. Environmental Protection Agency (U.S. EPA), the Ventura County Air Pollution Control District (VCAPCD) is requesting that the California Air Resources Board (CARB) withdraw the Ventura County's 1994 1-hour Ozone Plan Contingency Measures and 1997 Ozone Plan. This request is based on EPA's confirmation letter dated June 20, 2019 stating that even though both submittals were required under Clean Air Act provisions for nonattainment areas, the above submittals are not currently needed and now can be withdrawn with no adverse consequences for the following reasons:

Regarding the 1994 Ventura County 1-hour ozone contingency measures, on November 8, 1994, the VCAPCD Board adopted the 1994 Air Quality Management Plan (AQMP) to satisfy the statutory requirements of 1990 federal Clean Air Act Amendments (CAAA). Section 182(c)(2)(A) of CAAA required the District to demonstrate attainment of the federal ozone standard by November 2005. Also, Section 182(c)(9) and 172 (c)(9) of CAAA required that the 1994 AQMP to include contingency measures to ensure continued progress toward attaining the federal ozone standard in Ventura County. After Board adoption, the 1994 AQMP was remitted to CARB for the state's board adoption and ultimately submitted to the U.S. EPA on November 15, 1994.

Later, on January 8, 1997, the U.S. EPA approved the 1994 Ventura's plan for 1-hour ozone standard, except for the contingency measures. On May 27, 2009, EPA made a determination that the requirement of Section 172(C)(9), the contingency measures for 1-hour standard, do not apply to Ventura County as we attained the 1-hour ozone standard by our applicable attainment date (74 FR 25153, codified at 40CFR 52.282(a)). Therefore, contingency measures for 1-hour ozone standard are no longer needed and withdrawal of the contingency measures in this plan submission would have no adverse consequences.

Regarding the 1997 8-hour ozone plan, on May 13, 2008, the VCAPCD Board adopted the 2007 AQMP to satisfy the statutory requirements of 1990 federal CAAA. On June 15, 2004, U.S. EPA designated Ventura County a moderate nonattainment area for the 1997 8-hour ozone standards. On

February 14, 2008, CARB formally requested that U.S. EPA reclassify Ventura County to serious nonattainment area which required the Ventura County to meet the federal 8-hour standards by June 15, 2013.

On October 2, 2008, U.S. EPA found the Ventura County 1997 ozone plan complete. Based on U.S. EPA's confirmation letter dated June 20, 2019, the Ventura County 2007 AQMP which California submitted to satisfy the 1990 CAAA requirements for the 1997 8-hour ozone standards is not required since:

1. The U.S. EPA's revocation of the 1997 8-hour ozone standards eliminates the requirement for California to submit an emission inventory and emission statement rule for the National Ambient Air Quality Standards (NAAQS) in Ventura County.
2. U.S. EPA's December 3, 2012 clean data determination for Ventura County suspended the remaining anti-backsliding requirements for these NAAQS in the area for so long as the area continues to meet the NAAQS (77 FR 71551).

If you have any questions or would like to discuss the above items, please contact me at 805-645-1440, mike@vcapcd.org, or Ali Ghasemi, Division Manager of Planning, Rule Development and Incentive programs at 905-645-1427, aghasemi@vcapcd.org.

Sincerely,



Michael Villegas
Air Pollution Control Officer

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